### NPAFry 100009:05 PM 10/18/98, NPRM #98-143 comments through

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Subject: NPRM #98-143 comments through Oct 14

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The Morse code proposal favored by 465 comments though Oct 14 are:

No change 20% ARRL proposal 29% No Code international 46% No comment 6%

More than 75% of the comments favor a 5wpm or less code test for General class privileges. Even some of the "no change" group are conceding that 5wpm code is inevitable. With ARRL, No Code International, National Conference of VEC, and 3 out 4 hams favoring a 5wpm General class, it would appear that the FCC would be compelled to adopted that position. For them to do otherwise would be a very bad sign for the future of Amateur Radio.

For higher class licenses, Advance and Extra, 49% favor 12wpm or greater code test, while 46% favor 5wpm or less code test. This reflects the division of license class between Fast code and Slow/No Code licenses.

We need comments supporting 5wpm for Advance and Extra class. It FCC adopts 12wpm for these classes, they will forced to take up the issue again in a few years.

We also need to get the FCC to address the S25.5 question.

I hope that NCI is preparing a formal comment. It should be filed no latter than Nov 15. Comment period end Dec1. After that date the Comment spread sheet could be made file with the FCC as a reply to the comments filed.

Does anyone known how many non-electronic comments have been filed.?

KC8EPO NCI #1166 Larry Klose

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I support the modernization of Amateur Radio regulations to assure its survival into the 21st century!

No. of Copies rec'd ListABCDE

To: The Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

**EXAMPLE** 

c.c.: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchgott-Roth
Commissioner Gloria Tristani

# Before the Federal Communications Commission

In the Matter of WT Docket No. 98-143: Restructuring of the Amateur Service, Part 97

Summary: Three classes of licenses and one level of code proficiency at 5 words per minute (wpm) are the two most essential components that the FCC should include in their final proposal for "Restructuring of the Amateur Radio Service." These provisions, if adopted, would have the following immediate effect of: (a) Reducing the work load of the FCC -- three licenses in place of six, (b) Streamlining the amateur testing program relevant to current and future technology and (c) Facilitating the growth of the amateur service.

#### Provision 1. Number of License classes:

In my view the FCC's proposal does not go far enough toward streamlining and modernizing amateur radio. The proposed four classes of licenses are simply too many. I suggest you eliminate the following classes -- Novice, Tech Plus, and Advanced and retain the following classes -- Technician, General, and Extra. Current Novice and Technician Plus licensees should be "grandfathered" to General class operators and the current Advanced class licensees should be "grandfathered" as Extra class operators.

The Technician class should become the sole entry class license. It would grant VHF privileges and entail a basic written test, but no Morse requirement. The General class license would grant full HF privileges and would entail a written test and a 5 wpm Morse code requirement. The Extra class license would entail a comprehensive written examination and signify superior achievement and comprehensive knowledge of all areas of theory and amateur practice — however, it would not require an additional level of Morse code proficiency. Frequency allocations can continue to reflect differences in the license classes in an appropriate fashion as they currently do. This system would put the US in alignment with other CEPT countries who, at the most, have only three license classes — two HF and one VHF.

#### **Provision 2.** Morse Code Testing at 5 wpm Maximum.

I support the FCC's suggestion to replace the Morse code requirement with more relevant written testing on various aspects of current and developing technology. Today, Morse code is merely one of many modes of communication and there is no reason to single it out as particularly significant or important. A single 5 wpm Morse test will also remove the necessity of processing and issuing waivers for the handicapped. Eventually, all Morse testing should be eliminated consistent with US obligations under International treaties.

These suggestion, if adopted, would simplify the licensing processes and ensure, into the twenty-first century, the continuing history of amateur radio service to the country

Respectful	lly	su	bm.	itted	Ļ
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SILOS		Apparently we are governed by person from World War II, who have gone thru the telegraphy system							
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BUS BAR	Suggested:	Technician plus 5	words						
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